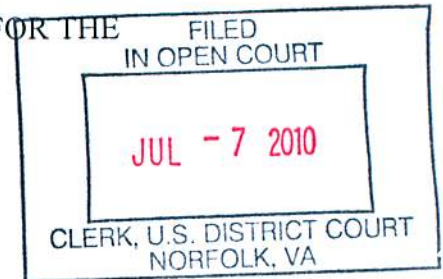


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA

v.

MOHAMED ALI SAID,
a/k/a Maxamad Cali Saciid,

MOHAMED ABDI JAMA,
a/k/a Mohammed Abdi Jamah,

JAMA IDLE IBRAHIM,
a/k/a Jaamac Ciidle,

ABDICASIIS CABAASE,
a/k/a Ahmed Mahomood,

ABDI RAZAQ ABSHIR OSMAN,
a/k/a Abdirasaq Abshir,

MOHAMED FARAH,
a/k/a Mohamed Farraah Hassan,

Defendants.

CRIMINAL NO. 2:10cr57

18 U.S.C. §§ 1651 & 2
Piracy under the Law of Nations
(Count 1)

18 U.S.C. §§ 1659 & 2
Attack to Plunder Vessel
(Count 2)

18 U.S.C. §§ 2291(a)(6) & 2
Act of Violence Against Persons on a
Vessel
(Count 3)

18 U.S.C. §§ 2291(a)(9)
Conspiracy to Perform Act of Violence
Against Persons on a Vessel
(Count 4)

18 U.S.C. §§ 113(a)(3) & 2
Assault with a Dangerous Weapon in the
Special Maritime Jurisdiction
(Count 5)

18 U.S.C. §§ 111(a)(1), 111(b) & 2
Assault with a Dangerous Weapon on
Federal Officers and Employees
(Count 6)

18 U.S.C. § 924(o)
Conspiracy Involving Firearm and a Crime
of Violence
(Count 7)

) 18 U.S.C. §§ 924(c)(1)(A)(iii) & 2
) Use of Firearm During a Crime of Violence
) (Count 8)
)

SUPERSEDING INDICTMENT

July 2010 Term – At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Piracy under the Law of Nations)

On or about April 10, 2010, on the high seas, the defendants, MOHAMED ALI SAID, a/k/a Maxamad Cali Saciid, MOHAMED ABDI JAMA, a/k/a Mohammed Abdi Jamah, JAMA IDLE IBRAHIM, a/k/a Jaamac Ciidle, ABDICASIIS CABAASE, a/k/a Ahmed Mahomood, ABDI RAZAQ ABSHIR OSMAN, a/k/a Abdirasaq Abshir, and MOHAMED FARAH, a/k/a Mohamed Farraah Hassan, and others known and unknown, aided and abetted by one another, committed the crime of piracy as defined by the law of nations, and were afterwards first brought into and found and arrested in the Eastern District of Virginia in the United States.

(In violation of Title 18, United States Code, Sections 1651, 3238 and 2.)

COUNT TWO

(Attack to Plunder Vessel)

On or about April 10, 2010, on the high seas, the defendants, MOHAMED ALI SAID, a/k/a Maxamad Cali Saciid, MOHAMED ABDI JAMA, a/k/a Mohammed Abdi Jamah, JAMA IDLE IBRAHIM, a/k/a Jaamac Ciidle, ABDICASIIS CABAASE, a/k/a Ahmed Mahomood, ABDI RAZAQ ABSHIR OSMAN, a/k/a Abdirasaq Abshir, and MOHAMED FARAH, a/k/a Mohamed Farraah Hassan, who were first brought to and arrested in the Eastern District of Virginia, and others known and unknown, aided and abetted by one another, by surprise and open force, maliciously attacked and set upon a vessel belonging to another, specifically, the USS Ashland belonging to the United States of America, with an intent unlawfully to plunder the same, and to despoil any owner thereof of any moneys, goods, and merchandise laden on board thereof.

(In violation of Title 18, United States Code, Sections 1659, 3238 and 2.)

COUNT THREE

(Act of Violence Against Persons on a Vessel)

On or about April 10, 2010, wherein the prohibited activity took place in an area outside the United States and where (a) a victim was a national of the United States, (b) the activity involved a vessel in which a national of the United States was on board, and (c) the activity involved a vessel of the United States, the defendants, MOHAMED ALI SAID, a/k/a Maxamad Cali Saciid, MOHAMED ABDI JAMA, a/k/a Mohammed Abdi Jamah, JAMA IDLE IBRAHIM, a/k/a Jaamac Ciidle, ABDICASIIS CABAASE, a/k/a Ahmed Mahomood, ABDI RAZAQ ABSHIR OSMAN, a/k/a Abdirasaq Abshir, and MOHAMED FARAH, a/k/a Mohamed Farraah Hassan, who were first brought to and arrested in the Eastern District of Virginia, and others known and unknown, aided and abetted by one another, did knowingly perform an act of violence against an individual and individuals on a vessel, specifically, the USS Ashland, and such act of violence was likely to endanger the safety of those on board the USS Ashland.

(In violation of Title 18, United States Code, Sections 2291(a)(6), 2290(a)(2), 3238 and 2.)

COUNT FOUR

(Conspiracy to Perform Act of Violence Against Persons on a Vessel)

On or about April 10, 2010, wherein the prohibited activity took place in an area outside the United States and where (a) a victim was a national of the United States, (b) the activity involved a vessel in which a national of the United States was on board, and (c) the activity involved a vessel of the United States, the defendants, MOHAMED ALI SAID, a/k/a Maxamad Cali Saciid, MOHAMED ABDI JAMA, a/k/a Mohammed Abdi Jamah, JAMA IDLE IBRAHIM, a/k/a Jaamac Ciidle, ABDICASIIS CABAASE, a/k/a Ahmed Mahomood, ABDI RAZAQ ABSHIR OSMAN, a/k/a Abdirasaq Abshir, and MOHAMED FARAH, a/k/a Mohamed Farraah Hassan, who were first brought to and arrested in the Eastern District of Virginia, and others known and unknown, did knowingly conspire to violate Title 18, United States Code, Section 2291(a)(6), specifically, to perform an act of violence against an individual and individuals on a vessel and such act of violence was likely to endanger the safety of those on board.

(In violation of Title 18, United States Code, Sections 2291(a)(9), 2290(a)(2), and 3238.)

COUNT FIVE

(Assault with a Dangerous Weapon in the Special Maritime Jurisdiction)

On or about April 10, 2010, within the special maritime and territorial jurisdiction of the United States, the defendants, MOHAMED ALI SAID, a/k/a Maxamad Cali Saciid, MOHAMED ABDI JAMA, a/k/a Mohammed Abdi Jamah, JAMA IDLE IBRAHIM, a/k/a Jaamac Ciidle, ABDICASIIS CABAASE, a/k/a Ahmed Mahomood, ABDI RAZAQ ABSHIR OSMAN, a/k/a Abdirasaq Abshir, and MOHAMED FARAH, a/k/a Mohamed Farraah Hassan, who were first brought to and arrested in the Eastern District of Virginia, and others known and unknown, aided and abetted by one another, did assault with a dangerous weapon, specifically, a firearm, with intent to do bodily harm, and without just cause and excuse, a crew member and members of the USS Ashland.

(In violation of Title 18, United States Code, Sections 113(a)(3), 3238 and 2.)

COUNT SIX

(Assault with a Dangerous Weapon on Federal Officers and Employees)

On or about April 10, 2010, the defendants, MOHAMED ALI SAID, a/k/a Maxamad Cali Saciid, MOHAMED ABDI JAMA, a/k/a Mohammed Abdi Jamah, JAMA IDLE IBRAHIM, a/k/a Jaamac Ciidle, ABDICASIIS CABAASE, a/k/a Ahmed Mahomood, ABDI RAZAQ ABSHIR OSMAN, a/k/a Abdirasaq Abshir, and MOHAMED FARAH, a/k/a Mohamed Farraah Hassan, who were first brought to and arrested in the Eastern District of Virginia, and others known and unknown, aided and abetted by one another, did forcibly assault, oppose, impede, and interfere with a person and persons designated in Title 18, United States Code, Section 1114, while such person and persons were engaged in the performance of official duties, and did use a deadly and dangerous weapon in the commission of these acts, specifically, a firearm.

(In violation of Title 18, United States Code, Sections 111(a)(1), 111(b), 3238 and 2.)

COUNT SEVEN

(Conspiracy Involving Firearm and a Crime of Violence)

On or about April 10, 2010, on the high seas and within the special maritime and territorial jurisdiction of the United States, the defendants, MOHAMED ALI SAID, a/k/a Maxamad Cali Saciid, MOHAMED ABDI JAMA, a/k/a Mohammed Abdi Jamah, JAMA IDLE IBRAHIM, a/k/a Jaamac Ciidle, ABDICASIIS CABAASE, a/k/a Ahmed Mahomood, ABDI RAZAQ ABSHIR OSMAN, a/k/a Abdirasaq Abshir, and MOHAMED FARAH, a/k/a Mohamed Farraah Hassan, who were first brought to and arrested in the Eastern District of Virginia, and others known and unknown, did conspire to commit an offense under 18 U.S.C. § 924(c), specifically, the defendants conspired to use, carry, and discharge a firearm during and in relation to the commission of a crime of violence for which they may be prosecuted in a court of the United States, namely: the crimes charged respectively in Counts 1, 2, 3, 4, 5, and 6 of this indictment, which description of each said crime of violence is re-alleged and incorporated by reference as if set forth in full herein.

(In violation of Title 18, United States Code, Sections 924(o) and 3238.)

COUNT EIGHT

(Use of a Firearm During a Crime of Violence)

On or about April 10, 2010, on the high seas and within the special maritime and territorial jurisdiction of the United States, the defendants, MOHAMED ALI SAID, a/k/a Maxamad Cali Saciid, MOHAMED ABDI JAMA, a/k/a Mohammed Abdi Jamah, JAMA IDLE IBRAHIM, a/k/a Jaamac Ciidle, ABDICASIIS CABAASE, a/k/a Ahmed Mahomood, ABDI RAZAQ ABSHIR OSMAN, a/k/a Abdirasaq Abshir, and MOHAMED FARAH, a/k/a Mohamed Farraah Hassan, who were first brought to and arrested in the Eastern District of Virginia, and others known and unknown, aided and abetted by one another, did knowingly and unlawfully use, carry and discharge a firearm, during and in relation to the commission of a crime of violence for which they may be prosecuted in a court of the United States, namely: the crimes charged respectively in Counts 1, 2, 3, 4, 5, and 6 of this indictment, which description of each said crime of violence is re-alleged and incorporated by reference as if set forth in full herein.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii), 3238 and 2.)

United States v. Mohamed Ali Said, et al.

2:10cr57

A TRUE BILL:

REDACTED

FOREPERSON



NEIL H. MACBRIDE
United States Attorney